

OFFICE OF THE MONITOR
NUNEZ, ET AL. V. CITY OF NEW YORK, ET AL.

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MEMO ENDORSED

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December 20, 2024

VIA ECF

The Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10006

Re: Nunez, et al. v. City of New York, et al., 11-cv-5845 (LTS) (JCF)

Dear Chief Judge Swain,

We write regarding the work related to the proposed Remedial Relief. The Court has directed the Monitoring Team to organize and facilitate meet and confer sessions with the Parties.¹ The Monitoring Team has been working diligently to address the Court's orders and facilitate the work of the Parties in order to provide the Court with the requested submissions pursuant to the November 27, 2024 Order at page 58. Over the last few days, it has become apparent to the Monitoring Team that additional time is needed in order to ensure this process is conducted in a reasonable manner. In particular, over the last few days, the Monitoring Team, has shared substantive feedback with both sides that we believe merits additional consideration and discussion. Given the upcoming holidays,² there are some limitations on the work that can be conducted over the next two weeks. To be certain, the Monitoring Team and the Parties will continue to work diligently, even over the holidays. However, it is the Monitoring Team's view

¹ See the Court's September 26, 2024 Order (dkt. 779) and the November 27, 2024 Order (dkt.803) at pg. 58.

² Between December 23, 2024 and January 3, 2024, there are two federal holidays as well as additional religious holidays observed including Christmas Eve, Hanukkah, and Kwanza.

that the current deadlines would limit the ability for the Parties to work together in an efficient and productive manner.

Accordingly, the Monitoring Team believes an extension of time is necessary to ensure that this process moves forward constructively. We therefore respectfully request the Court extend the deadlines in the November 27, 2024 Order (dkt. 803): (1) to file the Monitor's report (including the Memoranda from the respective Parties) from January 14, 2025 to January 24, 2025, and (2) for the parties to file any responses to the objections raised in the Memoranda from January 21, 2025 to January 31, 2025. The Monitoring Team believes this additional time is necessary in order for the Monitoring Team to convene additional discussions with the Parties separately and together, for the Parties to exchange information, and to permit the Parties to produce final proposals for the Court's consideration. The Monitoring Team appreciates the time sensitivity of these matters and the importance of moving as quickly as possible. It is our view that this 10-day extension will only serve to ensure that the discussions are more productive and the submissions to the Court are in the best position for review.

This is the Monitoring Team's first request for an extension of time related to these deadlines. The Monitoring Team has consulted with all Parties and they have reported that they do not object to this request.

We do not anticipate, at this time, that this requested extension of time will impact the timing of the Monitoring Team's report to the Court on LL42. Accordingly, the Monitoring Team intends to file its report on LL42 on January 31, 2025.³

³ See Monitor's November 22, 2024 Report (dkt. 802) at pgs. 36 to 40 and 193 and the Monitoring Team's December 3, 2024 Letter to the Court (dkt. 805).

We appreciate the Court's attention to this matter.

Sincerely,

s/ Steve J. Martin

Steve J. Martin, *Monitor*

Anna E. Friedberg, *Deputy Monitor*

The foregoing requests are granted. The deadlines in the November 27, 2024 Order (DE 803) are hereby extended: (1) to file the Monitor's report (including the Memoranda from the respective Parties) by **January 24, 2025**, and (2) for the parties to file any responses to the objections raised in the Memoranda by **January 31, 2025**. The Monitoring Team is hereby directed to file its report on Local Law 42 by **January 31, 2025**. DE 807 resolved.

SO ORDERED.

12/23/2024

/s/ Laura Taylor Swain, Chief USDJ